

**From:** [Larryafd](#)  
**To:** [Harrington, Dwayne](#)  
**Subject:** Re: EPA update  
**Date:** Sunday, July 10, 2016 2:31:45 PM

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Ok

Sent from my iPhone

On Jul 10, 2016, at 2:25 PM, Harrington, Dwayne <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)> wrote:

Thanks Larry

I'll contact you tomorrow

Sent from my iPhone

On Jul 10, 2016, at 2:24 PM, Larryafd <[charger22@aol.com](mailto:charger22@aol.com)> wrote:

That will work. The Sooner the pumpdown the better.

Sent from my iPhone

On Jul 10, 2016, at 2:21 PM, Harrington, Dwayne  
<[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)> wrote:

We've discussed that with the VFD. I'll talk with them tomorrow

Sent from my iPhone

On Jul 10, 2016, at 2:00 PM, Larryafd  
<[charger22@aol.com](mailto:charger22@aol.com)> wrote:

I agree that everything is a band aid at this point. If that relief valve lifts , it will blowing off for a long time. The other option is to put an a unmanned monitor (blitz fire ) in the street connected to a fire hydrant on the corner and set it to a fog pattern In the event of a release, you just have to open the hydrant to knock down the vapors. Fd has a blitz fire that can be used. No risk to responders and reduce off site risk too

Thoughts?

Larry

The only safe way is pump it out now

Sent from my iPhone

On Jul 10, 2016, at 12:21 PM, Harrington, Dwayne <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)> wrote:

What do you think ?

Sent from my iPhone

Begin forwarded message:

**From:** Peter Johnson  
<[pjohnson@gesoncall.com](mailto:pjohnson@gesoncall.com)>  
**Date:** July 10, 2016  
at 12:18:01 PM  
EDT  
**To:** "Harrington, Dwayne"  
<[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>, Jay Robertson  
<[jrobertson@gesoncall.com](mailto:jrobertson@gesoncall.com)>, Daniel Johnson  
<[djohnson@gesoncall.com](mailto:djohnson@gesoncall.com)>  
**Cc:** "Norrell, Neil"  
<[Norrell.Neil@epa.gov](mailto:Norrell.Neil@epa.gov)>  
**Subject: RE: EPA update**

Tarping of the condensers would limit the immediate exposure and migration of a release from the condensers, but this will not limit or mitigate the hazard of the ammonia itself. In some ways, I would think that

allowing a relief valve that is at a greater height would be a little more safe in terms of exposure as we would not be forcing the vapors to the ground level and allowing them to migrate from there. There really is no good option to this other than to have the system deactivated and drained, everything else at this point is merely a band-aid patch.

Peter

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**From:** Harrington, Dwayne  
[<mailto:Harrington.Dwayne@epa.gov>]  
**Sent:** Sunday, July 10, 2016 11:18 AM  
**To:** Peter Johnson  
<[pjohnson@gesoncall.com](mailto:pjohnson@gesoncall.com)>;  
Jay Robertson  
<[jrobertson@gesoncall.com](mailto:jrobertson@gesoncall.com)>;  
Daniel Johnson  
<[djohnson@gesoncall.com](mailto:djohnson@gesoncall.com)>  
**Cc:** Norrell, Neil  
<[Norrell.Neil@epa.gov](mailto:Norrell.Neil@epa.gov)>  
**Subject:** Fwd: EPA update

Tarping the condenser area to contain vapors.

What do you think?

Sent from my iPhone

Begin forwarded  
message:

**From:**  
[charger22@aol.com](mailto:charger22@aol.com)  
**Date:**  
July  
10,  
2016 at  
11:09:41  
AM  
EDT  
**To:**  
[rpagnini@vinelandcity.org](mailto:rpagnini@vinelandcity.org),  
[rtonetta@vinelandcity.org](mailto:rtonetta@vinelandcity.org),  
[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)  
**Subject:**  
**Re:**  
**EPA**  
**update**

Chief

We  
could  
use  
some  
salvage  
covers  
or  
Home  
Depot  
type  
tarps  
over the  
top of  
the  
condensers  
and tie  
them at  
the  
bottom  
and  
contain  
any  
vapor  
which  
may be  
released.  
It  
would  
be  
contained

to a  
very  
small  
area  
and  
stop a  
major  
off site  
release

I have  
done  
this  
before  
to  
contain  
a leak

Larry

-----  
Original  
Message-

-----  
From:  
Pagnini  
Robert  
<[rpagnini@vinelandcity.org](mailto:rpagnini@vinelandcity.org)>  
To:  
charger22  
<[charger22@aol.com](mailto:charger22@aol.com)>;  
Tonetta  
Richard  
<[rtonetta@vinelandcity.org](mailto:rtonetta@vinelandcity.org)>;  
Harrington,  
Dwayne  
<[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>  
Sent:  
Sun, Jul  
10,  
2016  
11:02  
am  
Subject:  
RE:  
EPA  
update

Received  
and  
noted. I  
see the  
issues  
with the  
relief  
valves.

Would it  
be  
possible  
to build  
a hood  
type  
system  
that  
could  
encapsulate  
the  
relief  
valves  
without  
compromising  
the  
valves  
or  
piping.  
Then  
direct  
the  
encapsulating  
hood  
device  
to  
discharge  
to the  
scrubber  
in the  
event of  
a relief  
valve  
failure?  
This  
would  
have to  
be  
designed  
to be  
free  
standing  
with its  
own  
supports  
as to  
not put  
any  
weight  
or strain  
on the  
relief  
valves  
or  
piping.

Sent

from my  
Windows  
Phone

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From:  
[charger22@aol.com](mailto:charger22@aol.com) <<mailto:charger22@aol.com>>  
Sent:  
7/10/2016  
9:40  
To:  
Tonetta  
Richard <<mailto:rtonetta@vinelandcity.org>>;  
Pagnini  
Robert <<mailto:rpagnini@vinelandcity.org>>  
Subject:  
EPA  
update

Here is  
the EPA  
update  
from  
yesterday,,  
Larry  
Update  
for  
7/9/16:

Two of  
the four  
relief  
discharges  
have  
been  
secured  
and  
routed  
to  
discharge  
to the  
scrubber,  
however,  
two  
pressure  
relief  
valves  
were  
not able  
to be  
secured.  
The  
state of  
deterioration  
of the  
vapor  
pressure  
relief

valves  
was  
found to  
be so  
severe  
that a  
secure  
connection  
is not  
possible.  
The two  
direct-  
discharge  
liquified  
ammonia  
direct-  
discharge  
vents  
were  
successfully  
attached  
to the  
scrubber.

After a  
review  
of the  
refrigeration  
system,  
EPA's  
refrigeration  
contractor  
determined  
that the  
two  
vapor  
relief  
valves  
could  
not be  
isolated  
to be  
replaced  
with  
new  
valves  
even  
temporarily  
because  
the  
overall  
refrigeration  
system  
is so  
deteriorated  
as to be  
inoperable,



and  
even  
under  
the best  
conditions  
the  
attempted  
operation  
would  
nevertheless  
result in  
a  
significant  
release  
(greater  
than  
100 lbs)  
of  
residual  
ammonia  
in the  
condensers,  
which  
would  
be an  
unacceptable  
risk to  
the  
technicians  
performing  
the  
work,  
not to  
mention  
the  
surrounding  
community.  
In  
addition,  
even if  
the  
valves  
could  
be  
safely  
removed,  
should  
their  
connecting  
screw-  
threads  
to the  
condensers  
be  
similarly  
deteriorated,  
which is

highly  
likely,  
they  
could  
not be  
replaced  
and that  
would  
essentially  
shut the  
system  
down  
permanently.

The  
refrigeration  
contractor  
also  
stated  
that,  
due to  
the  
design  
and  
deteriorated  
state  
and  
resulting  
inoperability  
of the  
system,  
a failure  
of one  
of the  
relief  
valves  
would  
ultimately  
result in  
the  
release  
from the  
valve of  
the  
entire  
contents  
of the  
ammonia  
in the  
system  
(currently  
roughly  
estimated  
at ten to  
twelve  
thousand  
pounds),

which  
could  
not be  
secured  
because  
of the  
state of  
the  
system,  
and the  
resulting  
release  
could  
possibly  
last up  
to two  
weeks  
(10,000-  
12,000  
lbs  
ammonia  
at 119  
psi  
through  
a 1/2  
vent  
line).

The  
facility  
owner  
told  
EPA  
that our  
and our  
contractors'  
activities  
on site  
were  
starting  
to make  
him  
nervous.

The  
relocation  
of the  
seven  
residences  
adjacent  
to the  
facility  
has  
been  
extended  
through  
Tuesday,

and  
possibly  
(probably)  
beyond,  
pending  
further  
assessment  
and  
developments.  
PAD is  
preparing  
an  
updated  
fact  
sheet.

The  
VFD  
has  
lifted  
the  
shelter  
in place  
standby  
advisory  
for  
neighborhood,  
however,  
the  
emergency  
notifications  
and  
instructions  
for the  
public in  
the  
event of  
a  
release  
remain  
intact.  
IMAAC  
release  
projections  
will be  
revised  
for  
current  
worst-  
case  
conditions.

EPA  
refrigeration  
system  
and  
structural

engineering  
contractors  
will be  
on site  
on  
Monday  
7/11/16  
to  
assess  
the  
refrigeration  
system  
and the  
building  
to  
determine  
what  
actions,  
including  
immediate  
emergency  
actions,  
are  
required  
to at  
least  
stabilize  
the  
situation,  
including  
what  
options  
are  
available  
to  
address  
the non-  
secured  
pressure  
relief  
valves  
on the  
condensers.

RST  
continues  
24-hr  
air  
monitoring.